## UNITED STATES BANKRUPTCY COURT IN THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Stacey Booker aka Stacey Jarrell:

Ben Houston Booker, Jr.

Bankruptcy No. 20-14801 MDC

Debtors

Chapter 13

Lakeview Loan Servicing

:

Movant

Stacey Booker aka Stacey Jarrell

Ben Houston Booker, Jr.

Kenneth E. West, Trustee

Respondents

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
OF LAKEVIEW LOAN SERVICING LLC

Debtors, by and through their attorney, Robert D. Steinberg, Esq. answer the Motion as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.
  - 4. Admitted.

- 5. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.
- 6. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial. By way of further answer, if the Debtor is behind in any payment Debtor is prepared to make arrangements to become current.
- 7. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.
- 8. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.
- 9. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial. While Debtor is unopposed to entering into potential agreements with the Movant it is Denied that Relief from the Stay is necessary to pursue such options.
- 10. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.

Wherefore, Debtor requests that this Honorable Court enter an Order denying the Motion for Relief.

Respectfully submitted,

BY: /s/ ROBERT D. STEINBERG ROBERT D. STEINBERG, ESQ. PA ID No. 34818 Willig, Williams & Davidson 1845 Walnut Street, 24<sup>th</sup> Floor Philadelphia, PA 19103 215-814-9225